UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

JOSE REINALDO DE OLIVEIRA SANTOS,

Defendant.

CASE NO

JUDGE

INDICTMENT

18 U.S.C. § 1542

THE GRAND JURY CHARGES:

COUNT 1

(False Statement in Application for Passport)

On or about January 7, 2025, in the Southern District of Ohio, the defendant, JOSE REINALDO DE OLIVEIRA SANTOS, willfully and knowingly made one or more false statements in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application, the defendant provided a false name, false date of birth, and false place of birth.

In violation of 18 U.S.C. § 1542.

s/Foreperson

Foreperson

**KELLY A. NORRIS** 

ACTING UNITED STATES ATTORNEY

NOAH R. LITTON (0090479)

**Assistant United States Attorney**